

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN

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MAGNA ELECTRONICS INC.	)	
	)	
Plaintiff,	)	
	)	Case Nos. 1:12-cv-00654, 1:13-cv-324
v.	)	
	)	Honorable Paul L. Maloney
TRW AUTOMOTIVE HOLDINGS CORP.	)	Honorable Phillip J. Green
TRW AUTOMOTIVE US LLC; and	)	
TRW VEHICLE SAFETY SYSTEMS INC.	)	
	)	
Defendants.	)	
_____	)	

**DEFENDANTS' AMENDED EXPERT WITNESS DISCLOSURES – BURDEN OF PROOF**

Pursuant to the Case Management Orders entered in the consolidated cases and Fed. R. Civ. P. 26(a)(2)(A), Defendants (collectively, "TRW") disclose the name, address, area of expertise and a short summary of expected testimony for persons who may present evidence under Rules 702, 703 or 705 of the Federal Rules of Evidence for issues that it bears the burden of proof:

**1. Trevor J. Darrell, Ph.D**

University of California at Berkeley  
748 Sutardja Dai Hall  
Berkeley, CA 94720

Dr. Darrell is expected to testify about the following: General terminology, concepts and various technical aspects of the asserted patents; technical knowledge of Magna-asserted Magna I patents (based on the information on the patents' specifications and drafted claims, and other sources); identity of the person of skill in the art for purposes of an invalidity analysis and *Markman*; explanation of the technology; claim construction; infringement; invalidity;

unenforceability; TRW Automotive U.S. LLC's and Magna's products at issue in this case; and evaluation of documents provided by Magna and other documents and statements related to the case. Dr. Darrell's CV is attached.

**2. Homayoon "Kaz" Kazerooni, Ph.D**

University of California at Berkeley  
6147 Etcheverry Hall  
Berkeley, CA 94720

Dr. Kazerooni is expected to testify about the following: General terminology, concepts and various technical aspects of the asserted patents; technical knowledge of the Magna-asserted Magna II patents (based on the information on the patents' specifications and drafted claims, and other sources); identity of the person of skill in the art for purposes of an infringement analysis and *Markman*; explanation of the technology; claim construction; infringement; invalidity; unenforceability; TRW Automotive U.S. LLC's and Magna's products at issue in this case; and evaluation of documents provided by Magna and other documents and statements related to the case. Dr. Kazerooni's CV is attached.

**3. Jeffrey A. Miller, Ph.D**

University of Southern California  
941 Bloom Walk, SAL 300  
Los Angeles, California 90089-0781

Mr. Miller is expected to testify about the following: General terminology, concepts and various technical aspects of the asserted patents; technical knowledge of the Magna-asserted Magna I patents (based on the information on the patents' specifications and drafted claims, and other sources); identity of the person of skill in the art for purposes of an invalidity analysis and *Markman*; explanation of the technology; claim construction; infringement; invalidity; unenforceability; TRW Automotive U.S. LLC's and Magna's products at issue in this case; and

evaluation of documents provided by Magna and other documents and statements related to the case. Dr. Miller's CV is attached.

**4. James "Jim" Carmichael**

Miles & Stockbridge P.C.  
1751 Pinnacle Drive, Suite 1500  
Tysons Corner, VA 22102

Mr. Carmichael is expected to testify about the following: The nature of patents, the bundle of rights that they convey to the owner, and the manner in which that bundle of rights is obtained, including but not limited to the rules and procedures employed by the patent office to review and grant patents such as the patents in suit, and the conduct and obligations of all parties during patent office proceedings. Mr. Carmichael's CV is attached.

**5. Monson H. Hayes**

George Mason University  
Nguyen Engineering Building, Suite 3100  
4400 University Drive, MSN 1G5  
Fairfax, VA 22030

Dr. Hayes is expected to testify about the following: General terminology, concepts and various technical aspects of the asserted TRW patents ('116 and '287); technical knowledge of the asserted patents (based on the information on the patents' specifications and drafted claims, and other sources); identity of the person of skill in the art for purposes of an invalidity analysis and *Markman*; explanation of the technology; claim construction; infringement; TRW Automotive U.S. LLC's and Magna's products at issue in this case; and evaluation of documents provided by Magna and other documents and statements related to the case. Dr. Hayes' CV is attached.

**6. James J. Nawrocki**

IPFC Corp.

1000 Memorial Drive, Suite 300  
Houston, Texas 77024-3422

Mr. Nawrocki is expected to testify about the following: financial issues related to TRW Automotive U.S. LLC's and Magna's products at issue in this case and the market for such products; computation and analysis of damages relating to patent infringement by Magna and adequate to compensate TRW Automotive U.S. LLC for Magna's infringement, including damages applicable under 35 U.S.C. § 284 and any other applicable damages; and evaluation of documents provided by Magna and other documents and statements related to the case. Mr. Nawrocki's CV is attached.

TRW reserves all rights to amend and supplement its Expert Witness Disclosures.

Dated: November 20, 2014

Respectfully submitted,

/s/ Allan J. Sternstein  
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